Message

From: Arnold, Rick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A545BF3329054C1B8F0F65D0F45797DE-ARNOLD, LAR]
Sent: 9/9/2020 4:13:15 PM
To: Minter, Douglas [Minter.Douglas@epa.gov]
Subject: RE:

Perfect.

Thanks!

From: Minter, Douglas <Minter.Douglas@epa.gov>
Sent: Wednesday, September 9, 2020 10:09 AM
To: Arnold, Rick <Arnold.Rick@epa.gov>
Subject: RE:

Rick: here is the latest I have on this for supervisors from the HR folks in HQs:

Time Reporting Codes (TRCs) for Agency Locations in Different Phases of Reopening

- Employees at agency locations in Phase 2 of reopening should no longer use the unscheduled telework code (i.e., TWUSH). Instead, employees utilizing expanded telework flexibilities should use the episodic/situational code (i.e., TWEHR) when the telework used isn't regular, medical or a reasonable accommodation.
- Employees at agency locations still in Phases 0 or 1 will continue to use TWUSH.
- The following is a list of TRCs and guidance for recording time and attendance:
  - **Telework Regular – TREGW** – For use by employees who have regular telework days as part of their normal schedules, regardless of reopening Phase.
  - **Telework Unscheduled – TWUSH** - For use by agency locations with maximum telework flexibility still in place (i.e., Phases 0 or 1) and working unscheduled telework as a result of COVID-19.
  - **Telework Episodic/Situational – TWEHR** - For use by agency locations with expanded telework flexibility in place (i.e., Phase 2 or higher) and the telework isn't regular, medical or a reasonable accommodation.

Douglas

From: Minter, Douglas <Minter.Douglas@epa.gov>
Sent: Friday, August 21, 2020 9:03 AM
To: Douglas Minter <mintersfour@gmail.com>
Cc: Minter, Douglas <Minter.Douglas@epa.gov>
Subject:

Attachment 2: Summary of Class III Area Permit Requirements

- Permit Summary: Powertech proposed up to 14 wellfields and 1,500 injection wells.
- General Permit Requirements: The permit requires wellfield characterization to ensure adequate upper and lower confining zones for vertical and horizontal confinement of injected fluids. These characterizations will be part of a Data Package Powertech submits to EPA for each wellfield before EPA authorizes injection well operations.
- The UIC Program anticipates retaining the geochemical modeling requirements supported by targeted monitoring as proposed in our second draft permit. Both the NRC and Powertech believe these requirements are not needed for the protection of USDWs downgradient from the AE boundary. Other commenters said geochemical modeling is not as effective as the monitoring proposed in the first draft permit.
- Permit requirements are needed to protect USDWs outside the exempted area during and after ISR operations that are based on site-specific data. Work derived from a Regional Applied Research Effort with the US Geologic Survey and the EPA Office of Research and Development indicated potential for groundwater restoration concentrations of ISR contaminants to increase after the stability monitoring period specified in the NRC License and be transported toward the aquifer exemption boundary under certain conditions that are present for some wellfields at the Dewey Burdock site. The geochemical modeling and targeted monitoring requirements in the Class III permits evaluate potential impacts to USDWs from these effects.
- The Class III final Area Permit also contains excursion monitoring and operational monitoring required in the NRC License, even though both Powertech and the NRC requested to have them removed. These requirements are necessary to protect USDWs and to meet UIC regulations.
- Removing these requirements would require a third public comment period and would likely not be defensible, as it would not meet the UIC regulations. Opponents will likely challenge removal of monitoring requirements.
- Powertech must provide financial assurance covering the first ISR wellfield for EPA review and approval before we issue the final Permit.

Attachment 3

Ex. 5 Deliberative Process (DP)

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